

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA, *

Plaintiff, *

v. * **Case No. 25-cr-20032-JTF**

SANJEEV KUMAR, *

Defendant. *

**NOTICE OF CONSULTATION FOR DEFENDANT'S MOTION FOR BILL OF
PARTICULARS**

Defendant Dr. Sanjeev Kumar, through undersigned counsel, files this Notice of Consultation for his *Motion for a Bill of Particulars* (“Motion”). Pursuant to the Court’s instructions at the May 7, 2025 status conference on this matter, counsel for Dr. Kumar conferred with counsel for the United States on May 30, 2025, regarding the issues raised in the Motion. After careful consideration of that discussion and further review of the Indictment and the Rule 16 discovery provided to Dr. Kumar, it is clear that the issues raised in the Motion are unresolved and that Dr. Kumar’s Constitutional rights continue to be at stake. As such, Dr. Kumar now files this Notice to inform the Court of the parties’ consultation and to respectfully request that this Court consider and rule upon his *Motion for a Bill of Particulars*.

Respectfully submitted,

s/ Lawrence J. Laurenzi

Lawrence J. Laurenzi (TN BPR No. 9529)
Elena R. Mosby (TN BPR No. 40562)
BURCH, PORTER & JOHNSON, PLLC
130 N. Court Ave.
Memphis, TN 38103

(901) 525-5000

Ronald Chapman, III (pro hac vice)
Maritsa Flaherty (pro hac vice)
CHAPMAN LAW GROUP
1441 W. Long Lake Rd., Ste. 310
Troy, Michigan 48098
(248) 644-6323

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded via electronic mail on this 23rd day of June 2025, to the following:

Lynn Crum (Lynn.Crum@usdoj.gov)
Scott Smith (Scott.Smith@usdoj.gov)
Sarah Pazar Williams (Sarah.Williams2@usdoj.gov)
UNITED STATES ATTORNEY'S OFFICE
Western District of Tennessee
167 N. Main Street, Suite 800
Memphis, TN 38103
T: 901-969-2984

s/ Lawrence J. Laurenzi
Lawrence J. Laurenzi